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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
Washington, D.C. 20460

OFFICE OF  
GENERAL COUNSEL

The Honorable Walter M. Shaub, Jr.  
U.S. Office of Government Ethics  
Suite 500  
1201 New York Avenue, NW  
Washington, D.C. 20005-3919

Dear Mr. Shaub:

As required by 5 C.F.R. § 2634.605(c), I have reviewed the Public Financial Disclosure Report (OGE 278) submitted by the Honorable Edward Scott Pruitt in connection with his nomination to be the Administrator of the U.S. Environmental Protection Agency.

As required by 18 U.S.C. § 208(a), he will not participate personally and substantially in any particular matter in which he knows that he has a financial interest directly and predictably affected by the matter, or in which he knows that a person whose interests are imputed to him has a financial interest directly and predictably affected by the matter, unless he first obtains a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualifies for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). He understands that the interests of the following persons are imputed to him: any spouse or minor child of his; any general partner of a partnership in which he is a limited or general partner; any organization in which he serves as officer, director, trustee, general partner or employee; and any person or organization with which he is negotiating or has an arrangement concerning prospective employment.


Upon confirmation, he will resign from his positions with the following entities: Southern Baptist Theological Seminary, and the Windows Ministry Incorporated. He resigned from his position with the Rule of Law Defense Fund on December 8, 2016. For a period of one year after his resignation from each of these entities, he will not participate personally and substantially in any particular matter involving specific parties in which he knows that entity is a party or represents a party, unless he is first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Upon confirmation, he will resign from his position as Attorney General of the State of Oklahoma. For a period of one year after his resignation, he will have a "covered relationship" under 5 C.F.R. § 2635.502 with the State of Oklahoma. Pursuant to 5 C.F.R. § 2635.502(d), he will seek authorization to participate personally and substantially in particular matters involving specific parties in which he knows the State of Oklahoma is a party or represents a party.

He has been advised that this ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

I therefore determine that his ethics agreement and financial disclosure report disclose no likely conflict of interest under applicable statutes and regulations. Accordingly, I have signed his report. Please call Justina Fugh, Senior Counsel for Ethics, at (202) 564-1786 if you have any questions.

Sincerely,

  
for Kevin S. Minoli  
Designated Agency Ethics Official